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From: Siffring, Stuart
Sent: Tue 9/15/2015 1:36:16 PM
Subject: Utah's LDAR BACT for new sources covered under GAO - info for U&O FIP

Hi All,

There was a question yesterday at the U&O update about Utah's LDAR program under the GAO, and looking closer I found the details. Here is the short and sweet version:

-All sites inspected within 90 days of startup

-Sites >10,000 bbls/year production are inspected every year

-Sites>25,000 bbls/year every 3 months unless no leaks are found for 2 years, then every year

-Inspections must be done with an IR camera or other electronic analyzer

-Considered a leak if >500ppm

Here is the text which should help inform any cost estimates or applicability questions.

"BACT for leaks/fugitive emissions is to inspect all sources covered by this GAO within 90 days of startup, every year for sources that have a throughput more than 10,000 barrels per year, and every three months for sources that have a throughput more than 25,000 barrels per year. NSPS Subpart OOOO requires sources to initiate repair of a leak within 5 days of detection, and be completed with repair within 15 days of detection. These frequencies are also considered BACT. Records of inspections and repairs must be kept by the source."

So the costs should be similar to NSPS OOOO and the number of affected sources can be estimated through our Minor Source Registration data. Let me know if there is any other questions that pop up! Thanks,

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